

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

UNITED STATES OF AMERICA, et al.,

Plaintiffs,

v.

STATE OF WASHINGTON,

Defendant.

NO. C70-9213

Subproceeding 01-1 (Culverts)

SECOND DECLARATION OF  
MARY E. JONES

I, MARY E. JONES, declare as follows:

1. I am a Paralegal with the Washington State Attorney General's Office, assigned to the Fish, Wildlife and Parks Division. As part of my duties, I am assigned to assist the attorneys handling the above litigation.

2. The Washington Association of Counties are filing a Memorandum In Support of the State's Motion for Summary Judgment. The Counties' Memorandum contains footnote references to various discovery materials. I have attached hereto true and correct copies of pages referred to in those footnotes from the Plaintiff-Intervenor Tribes' Answers and Responses to Washington's Third Discovery Requests (May 27, 2005) and from Plaintiff's Supplemental Memorandum In Support of Motion for Partial Summary Judgment filed in the original Phase II of this action (January 12, 1979). Also attached are true and correct copies of

1 deposition pages referred to in those footnotes from the depositions of six of the Tribes'  
2 witnesses: Martin Fox, Stanley G. Jones, John Klochak, Russ Ladley, Larry Wasserman and  
3 Jay Zischke.

4 3. I declare under penalty of perjury that the foregoing is true and correct.

5 Executed on this 7<sup>th</sup> day of August, 2006.  
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10 MARY E. JONES  
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